

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
V.	)	12 CR 172-2
	)	
Chadia Abueid,	)	
Defendant	)	

REQUEST FOR EMERGENCY HEARING ON AMENDING CONDITIONS OF BOND

NOW COMES CHADIA ABUEID, by her attorney Robert G. Clarke, requesting this court for an emergency hearing with regard to changing the conditions of her bond with respect to travel and in support thereof states:

1. Defendant Abueid was enlarged on bond on March 12, 2012 by Magistrate Nolan;
2. Defendant has had no violations of the conditions of her bond;
3. Said bond confined her to the Northern District of Illinois unless approval of this court allowed more extensive travel;
4. That Ms. Abueid makes that request because of the death of her father, Mohammed Salim Ali Maali in Ramallah, Palestine on Sunday, June 9, 2013;
5. That attached is a copy of a Medical Report from the hospital in Jerusalem where he died;
6. That he was buried thereafter according to Islamic custom yesterday;
7. That defendant has been a citizen of the United States since 2002;

8. That her husband is a citizen of the United States, employed here in a local convenience store and has been a resident of the United States since he was 2 years of age having been brought here by his parents at that age;
9. That defendant has few ties to Palestine, i.e. her mother and an elderly uncle, a brother of her deceased father and two siblings;
10. Her immediate family consists of 11 siblings, only two of whom live in Palestine, Nadia and Mustafa; her other eight siblings live in the United States, 7 of whom are citizens of the United States;
11. Defendant actually lived the first 17 years of her life in Brazil, five years in Palestine and since 2002 in the United States;
12. Her primary adult attachments are to the United States and she states that living in Palestine was extremely difficult due to almost constant political turmoil;
13. That she has a three year old son, Nidal, who is a citizen of the United States and whose entire future is to grow up in America;
14. That defendant faces no mandatory minimums in her sentencing in this case and has no prior convictions or arrests.
15. That defendant promises to return when the court orders her to return.

Wherefore defendant prays that she be allowed to travel to Palestine (through Amman, Jordan) to visit her mother and other family members after the death of her father, Mohammad Salim Ali Maali.

ATTACHMENTS

1. Copy of Hospital Record of deceased's admission and treatment
2. Copy of hospital's confirmation of death
3. Copy of photos of traditional family mourning immediately before burial,  
Ramallah, Palestine.

Respectfully Submitted,

s/Robert G. Clarke, Attorney

NOTICE OF FILING-PROOF OF SERVICE

I hereby certify that I have filed this motion to enlarge the bond of Chadia Abueid, this 10<sup>th</sup> day of June, 2013 with the clerk of the court using the CM/ECF system, which filing will send notification of such filing to the other CM/ECF participants.

s/Robert G. Clarke, Attorney